

1 reps elsewhere?

2 A Oh, yes.

3 Q Give me some idea of where all they are.

4 A Oh, they're all in Ashland.

5 Q I'm, I'm sorry. I, I, I misunderstood what you said

6 then.

7 A Well --

8 Q I thought you said that --

9 A -- the Ashland headquarters supports six different

10 operating divisions. There are customer-service reps that,

11 that specialize in various portions of our business.

12 Q Well, I'm, I'm talking about the customer-service

13 reps for paging.

14 A There are two in Ashland.

15 Q Okay. Now, are those the only paging customer-

16 service reps in the company?

17 A Yes.

18 Q Do, do you have a sales office only in Ashland?

19 A No.

20 Q Okay. Where all do you have sales offices for

21 paging --

22 A Lexington, Ashland, Huntington, Charleston and

23 Crestonsburg.

24 Q So, that's what, five?

25 A Five offices.

1 Q Five offices. And then I assume the salespeople  
2 then call the customer-service reps and have them do the --  
3 process the customer --

4 A That's one way.

5 Q -- sign-ups?

6 A That's one way.

7 Q What other ways are there?

8 A Fax -- or fax or e-mail through the network.

9 There's various ways to communicate between the offices.

10 Q Well, but what I'm saying is that the people out in  
11 the field then go through -- in some fashion, whether it's fax  
12 or whatever?

13 A Yes. Ashland is the controlling center of all the  
14 paging activity.

15 Q Right. So, the, the, the two customer-service reps  
16 there interface with all the salespeople to handle the  
17 customer changes. Is that right?

18 A Yes.

19 Q I believe you also testified that you couldn't  
20 conceive of any legitimate reason why -- I believe that it was  
21 a hypothetical of a volunteer fire department or a fire  
22 department, do you recall that on the two -- the pagers being  
23 chained to two different frequencies? Do you, do you recall  
24 that the, the testimony regarding the, the fire department?

25 A Yes.

1           Q     Okay, and am I correct that it was in reference to  
2 whether it made any sense or there was any legitimate reason  
3 in a chain sequence to have the chain on different  
4 frequencies?

5           A     Well, the, the example was meant to illustrate how  
6 chaining works and what its value is as chaining.

7           Q     Okay.

8           A     That you -- that the -- that you could call one  
9 number or each individual number and they would all go off by  
10 the one number -- the lead chain number.

11          Q     Okay. Well, but -- and you used did you not the  
12 example of a, of a volunteer fire department --

13          A     Yes.

14          Q     -- the chief of a volunteer fire department who  
15 wanted to contact all the people on the --

16          A     Yes.

17          Q     -- on the -- in the, in the core --

18          A     Right.

19          Q     -- whatever, to tell them there's some sort of  
20 emergency? All right. Now, let's assume hypothetically what  
21 -- RAM you said has a common-carrier frequency and a private-  
22 carrier paging frequency. Let's also assume that the  
23 volunteer fire department has its own, what should I call it,  
24 special emergency frequency for units associated with the,  
25 with the volunteer fire department.

1 A Yes.

2 Q Is that term familiar with you?

3 A Yes. They have a private system themselves?

4 Q Right --

5 A Yes.

6 Q -- and that the concept is a familiar one to you,  
7 that the volunteer fire department would have such a system.  
8 Is that right?

9 A Several of them do, yes.

10 Q And that system could be both mobile and paging,  
11 couldn't it?

12 A I don't know. Mobile and paging, I guess it could.  
13 I don't know.

14 Q Well, would you accept for purposes of discussion my  
15 representation that both paging and two-way mobile  
16 transmissions would be permitted on such systems?

17 A Okay.

18 Q All right. Now, let's assume that, that RAM has an  
19 agreement with the volunteer fire department whereby it would,  
20 it would provide what I will call the dispatching service for  
21 pagers on that shared-frequency service. Are, are you with me  
22 so far?

23 A No.

24 Q All right. Let's assume that in effect RAM's  
25 terminal has now put -- a third channel which happens to be

1 | this special emergency frequency system operated by the  
2 | volunteer fire department, okay? So, that --

3 |       A     Okay.

4 |       Q     -- that pages that go out over that system are  
5 | actually called in through RAM's terminal and then routed to  
6 | that transmitter on that special emergency frequency. That's,  
7 | that's a possible configuration, is it not?

8 |       A     We're getting pretty farfetched but, yeah, that's  
9 | possible.

10 |       Q     Right. Okay. And --

11 |       A     You're saying that RAM's terminal would have three  
12 | channel cards?

13 |       Q     Right.

14 |       A     One for PCP, one for RCC and one for a private  
15 | channel that's not licensed to RAM and we're only controlling  
16 | it --

17 |       Q     On behalf of the fire department --

18 |       A     -- just gratis? Just, just --

19 |       Q     -- pursuant to a contract with the fire department.

20 |       A     That's possible -- technically possible, yes.

21 |       Q     Okay. Now, isn't it possible that some members of  
22 | the volunteer fire department would already be PCP customers  
23 | of RAM?

24 |       A     It's possible they could carry three or four pagers  
25 | on their belt, private ones, PCP, RCC, yes.

1 Q Okay, and isn't it possible --  
2 A All of this is possible.  
3 Q -- that if, if, if they're not a PCP customer  
4 perhaps they're a RAM common-carrier customer? Isn't that  
5 right?  
6 A That's possible. It's highly unlikely. It's the  
7 same covering area. Why would you want to carry two pagers --  
8 Q I didn't say that were two -- I'm saying --  
9 A Okay.  
10 Q -- that a member of the volunteer fire department is  
11 a pre-existing customer of RAM on either its PCP or RCC  
12 frequency. Do you understand that question?  
13 A Yes.  
14 Q All right. Now, in that scenario they would be  
15 carrying one page, would they not -- one pager, because  
16 they're a pre-existing customer of as an example the RCC  
17 channel?  
18 A And then join the volunteer fire department? I mean  
19 --  
20 Q Yeah.  
21 A -- let's say they --  
22 Q Let's, let's say that --  
23 A Yeah.  
24 Q -- they then join the volunteer fire department --  
25 A And, and --

1 Q -- all right, and say that --

2 A -- and didn't get a pager from them because they  
3 already had one through us?

4 Q We haven't said anything about getting pagers from  
5 the volunteer fire department.

6 A Okay.

7 Q We're only setting up the scenario whereby it is  
8 possible and I believe you agree with me that --

9 A Yes.

10 Q -- some, some members of the volunteer fire  
11 department may be pre-existing customers of RAM's common-  
12 carrier paging system.

13 A Yes, yes.

14 Q All right. And it's also possible is it not that  
15 some members of the volunteer fire department aren't customers  
16 at all of RAM's -- paging customers of RAM's or anyone else's.  
17 Isn't that true?

18 A Sure, that's possible.

19 Q And they wouldn't, they wouldn't be carrying a pager  
20 at all.

21 A That's right.

22 Q Isn't it also true that if the fire chief wanted to  
23 provide a group -- arrangement to serve all of those people in  
24 that fire department, that one very reasonable way to do so  
25 would be to set up a chain so that if a calls goes -- call

1 number it would go out to people who were not pre-existing  
2 customers -- paging customers on the fire department frequency  
3 to the customers who are pre-existing PCP users on the pager  
4 that they're already carrying, or on the common carrier?

5 A All that's possible but not reasonable.

6 Q Well, it is possible. It is not reasonable in your  
7 opinion. Isn't that right?

8 A Well, that's right. In my opinion it's not  
9 reasonable because you had asked me to, number one, install  
10 another channel card in my terminal that only one customer is  
11 going to use, cost prohibitive. Number two, establish an rf  
12 link from my terminal to the customer's terminal in an area  
13 that obviously I already have coverage in and then per this  
14 contract we're talking about ask the customer to cease using  
15 their own, route through to us just so that we can use it.  
16 Why not just take out theirs? They're going to save, they're  
17 going to save all of that and just give pagers from RAM to all  
18 of the --

19 Q You, you could make them a better deal on that  
20 couldn't you?

21 A It's, it's just not reasonable to, to build a  
22 network that way.

23 Q Okay. Well, suppose --

24 A Possible, yes. Reasonable in my opinion, absolutely  
25 not.



1           Q     But the reason -- or the, the, the reason that it is  
2 not reasonable in your opinion if I understand your testimony  
3 correctly is that the -- there's no purpose in having this  
4 third transmitter out there, so it would -- you -- as I  
5 understand it, you don't see the sense, why would they, why  
6 would they have this, this special emergency system when  
7 you've already got the area covered. Isn't that right?

8           A     Well, if no one -- if only half the people have  
9 access to it, then why have it? You're, you're -- I mean --

10          Q     Well, suppose it's pre-existing.

11          A     Okay. We'll suppose -- yeah, we'll suppose it's a  
12 perfectly well-engineered system, yes, it's possible.

13          Q     And --

14          A     I wouldn't recommend it personally. I don't see the  
15 need for it other than argumentative purposes or explanatory  
16 purposes.

17          Q     Well, let's suppose that the, that the fire  
18 department has had this special emergency system for a long  
19 time before RAM went into the business.

20          A     Okay.

21          Q     It's certainly reasonable for that to be the case  
22 isn't it?

23          A     Still, those existing RAM customers unless they have  
24 two pagers, one won't have a pager to that system no matter  
25 how old it is.

1 Q But --

2 A And therefore that system alone is not going to  
3 alert everybody.

4 Q Precisely my point. Isn't it true that in that  
5 situation rather than make the user carry two pagers, one for  
6 the fire department frequency and one for their existing PCP  
7 or RCC customer, just chain the pages together so that when  
8 the group call comes out not only does it alert anyone who  
9 happens to be on the -- just the, the fire department  
10 frequency as well as anyone who is on -- pre-existing customer  
11 of the other? Isn't that right?

12 A I would just trade the pager out rather than build a  
13 whole other internetworking scheme.

14 Q But the --

15 A But yeah, it's, it's --

16 Q -- was that the assumption --

17 A -- very possible.

18 Q -- that the fire department was pre-existing, right,  
19 and --

20 A Like I said, I would trade those fire department  
21 peoples' pagers out, put them on RAM's pagers, take out all  
22 that equipment. they don't have any maintenance, they don't  
23 have any cost, they all get the same coverage or better, and  
24 make it a very clean situation for them. I would not do that  
25 --

1 Q Right.

2 A -- have not done that in the past and, and can't see  
3 any legitimate reason to do that other than just hypothetical  
4 supposes.

5 Q Okay, and, and of course you would charge them your  
6 normal customer charge for the service that you swapped them  
7 for, right?

8 A That's up to Mr. Capehart.

9 Q All right.

10 A And, and to have the interconnection agreement and  
11 the channel card in there, somebody's got to foot the bill,  
12 yes. There will be charges involved either way, whether it's  
13 our pagers or whether we buy a channel card, manage a control  
14 link, put a receiver in there so that they can not only  
15 control their own transmitter but we can control it too. All  
16 of that is expensive to do, yes. As opposed to putting out  
17 pagers would there be charges? In either case there will be  
18 charges. Mr. Capehart would determine whether -- which way we  
19 would do it and which one we make -- you know, which one was  
20 the best. I would recommend vehemently that we just trade out  
21 the pagers.

22 Q Trade out the pagers and if the members of the fire  
23 department didn't want to pay the, the monthly service charge  
24 that's too bad, right? It's like it or lump it, right?

25 A Somebody's going to pay for, somebody's going to pay

1 for the contract. Again, that's Mr. Capehart's call. Would I  
2 recommend that in an engineering session? No, I wouldn't.

3 Q Okay. If I understand you then, it's a marketing  
4 decision, not an engineering --

5 A How much to charge --

6 Q Right. Well --

7 A -- and who to charge --

8 Q -- it would be an economic arrangement.

9 A -- or to charge or not? All of those charges, to  
10 charge for the additional pager, to not charge for the control  
11 link and the channel card for the Commonwealth and the  
12 maintenance of it, all of those charges, I don't dictate  
13 charges in our company. I'd feed back the cost to marketing  
14 and they'd say something to the effect that yes, we ought to  
15 do this, what's the best way to do it? And I would certainly  
16 come up with the best way to do it and then they would  
17 determine -- and feed them the costs and they would determine  
18 the charges. I wouldn't -- certainly wouldn't race a horse  
19 backwards just so I can see where I've been.

20 Q All right, but your, your comment implies does it  
21 not that you believe RAM has the discretion to -- for example,  
22 on its common-carrier service to charge the customer its  
23 normal rate or not? Isn't that right?

24 A Would, would you rephrase it for me?

25 Q In the scenario you set up --

1 MR. JOYCE: Just so we clarify, I believe that was  
2 the scenario that Mr. Hardman set up that we're discussing  
3 now.

4 BY MR. HARDMAN:

5 Q All right. In, in the scenario that is pending  
6 before the witness, regardless of -- as I understood your  
7 testimony, you, you felt very strongly that the preferable way  
8 to do it would be to make an adjustment if necessary on the  
9 charge to the, to the customer for the normal RCC service  
10 rather than go through this setup with the third special  
11 emergency system.

12 A No, I don't -- I didn't say that. I don't set  
13 pricing policy in the company. And all I'm saying is that  
14 from an engineering point of view they would ask me to design  
15 a solution, I would, they would charge for it. I don't know  
16 any -- I don't know whether they would discount the pagers as  
17 opposed to buy the channel cards and eat the, the cost. I  
18 mean, I --

19 Q You're not concerned with those issues?

20 A Yeah, I'm concerned with them, because --

21 Q But I mean, that's not your bailiwick?

22 A No, I don't set pricing policy.

23 Q You, you, you make an engineering determination and  
24 if that has unfortunate, you know, marketing implications,  
25 that's somebody else's job. Isn't that right?

1 MR. JOYCE: Objection, Your Honor. There's no  
2 foundation for that question.

3 JUDGE CHACHKIN: He's asking him the question. It's  
4 cross-examination. Overruled.

5 MR. BOBBITT: I don't know what we would do as far  
6 as establishing the pricing in this hypothetical scenario. I  
7 just don't know.

8 BY MR. HARDMAN:

9 Q Well, you would agree with me would you not that,  
10 you would agree with me would you not that if your engineering  
11 solution which is to trade out the special emergency pager for  
12 say a common-carrier pager so that everyone would be on the  
13 same system, that would have economic implications for the  
14 customer, would it not?

15 A I don't know.

16 Q You don't know? You don't know whether RAM imposes  
17 a charge for its common-carrier service?

18 A I know that we do, but I don't know if that would  
19 have made an economical implication to the customer.

20 Q Is it RAM's normal practice to impose a charge on  
21 customers for its common-carrier service?

22 A Yes, it is.

23 Q So, if there were no charge, that would be an  
24 abnormal situation. Isn't that correct?

25 A I don't know that it would be abnormal or not. I

1 mean, that's -- we're so deep into hypotheticals. Yeah, I  
2 guess it would be abnormal, but I don't get charged for a  
3 pager and I carry one, so that's not abnormal.

4 Q Do you consider yourself a typical customer, as a,  
5 as a --

6 A No, of course not.

7 Q -- RAM employee?

8 A But this is --

9 Q Is that all RAM serves is their own customers, their  
10 own employees?

11 A No, but -- no, but it wouldn't be -- I don't know.  
12 I mean, would, would there be a charge? Very, very possibly.  
13 Would it be abnormal? I don't know.

14 Q You don't know whether it's abnormal whether RAM as  
15 a common carrier to charge customers for its common-carrier  
16 paging service? Is that what you're -- is that what you're --

17 MR. JOYCE: Asked and answered.

18 JUDGE CHACHKIN: Well, we haven't gotten an answer  
19 yet.

20 MR. BOBBITT: I don't know whether it would be  
21 abnormal to charge a common-carrier customer that had, that  
22 had asked us to put a control channel in their system,  
23 establish a control link, put a receiver in their network,  
24 establish a dual-control system for their private channel and  
25 not trade out the pagers, whether that would be abnormal or

1 whether giving them pagers in lieu of those charges would be  
2 abnormal. I don't know which one of those two scenarios would  
3 be the more abnormal. I my case -- in my opinion, I would go  
4 with the better engineering decision and I don't know what  
5 marketing would do as far as the pricing. I just don't know.

6 BY MR. HARDMAN:

7 Q But in that scenario, the arrangement for the  
8 special emergency system and the channel card and all those  
9 things you talked about, would be between RAM and the fire  
10 department, would it not?

11 A Yes.

12 Q As opposed to the service contract between RAM and  
13 its common-carrier customers, members of the fire department  
14 that are pre-existing customers of RAM, that, that service  
15 contract is between the members of the fire department and  
16 RAM. Isn't that so?

17 A Prior to the contract that we're talking about? It  
18 was, but post-contract I don't see any reason why we wouldn't  
19 bill the fire department for those customers' -- those users'  
20 pagers and not bill the users directly if that was part of the  
21 contract.

22 Q All right. So, your normal assumption would be that  
23 there would be a charge to the fire department for the use of  
24 --

25 MR. JOYCE: Your Honor, I object now. There's been



1 15 minutes we have allowed this hypothetical go to on.  
2 There's been no establishment that there is a volunteer fire  
3 department in this area, been no establishment that this two-  
4 way repeater scenario has anything to do with the facts at  
5 issue in this case. I, I think 15 minutes is long enough on  
6 this topic.

7 MR. HARDMAN: Your Honor, this, this witness was  
8 quite generous with his opinion before lunch as to how there  
9 was no justification for such an arrangement at all. And in  
10 such case I'm -- I believe I'm entitled to thoroughly test the  
11 witness's credibility, foundation and the accuracy of that  
12 opinion.

13 MR. JOYCE: Your Honor, if pigs had wings they could  
14 fly. We could sit here and go through hypotheticals for the  
15 next couple of weeks. If he can ask the client -- the, the  
16 witness a direct question, can you think of one scenario where  
17 this would make sense, we can cut through this instead of  
18 having to sit here through ridiculous hypotheticals for the  
19 next hour. That doesn't make any sense and it's not relevant  
20 to the issues in this case.

21 MR. HARDMAN: Your Honor, the --

22 JUDGE CHACHKIN: The objection is overruled. Go  
23 ahead, Mr. Hardman.

24 BY MR. HARDMAN:

25 Q Thank you. I'm trying to recall at this point where

1 the state of the record is after counsel's enlightenment and  
2 analogies. What I was trying to get at was the possible  
3 situation where it would be reasonable or plausible for a  
4 chain sequence to be set up across different paging channels.  
5 Now, I understand that you have your own view as to where in  
6 the continuum it would make sense to, to take say an  
7 engineering solution which you would characterize as trading  
8 out -- special emergency system as opposed to having a third  
9 channel card in, in the, in the system. But is it your  
10 testimony that you would consider a chain sequence across the  
11 different paging channels to be totally unreasonable under  
12 those circumstances?

13 A If both systems provide the same coverage to the  
14 same geographical area and the only reason to interconnect  
15 them is for number memory or dialing privilege or, or ease,  
16 it's unreasonable to do that solution.

17 Q And your answer is the same regardless of the  
18 financial impact of that solution on individual members of the  
19 fire department that might now have to subscribe to a  
20 different paging service than they -- or a new paging service  
21 that they hadn't previously had to subscribe to. Is that  
22 right?

23 A (No audible response.)

24 Q Your, your answer on the engineering reasonableness  
25 would be the same regardless of the financial impact on the

1 individual paging users that, that would follow from that  
2 engineering decision, right?

3 A That's the feedback that I would provide marketing,  
4 that I would provide them the engineering solution, what I  
5 thought to be the best solution. I don't know what, what we  
6 would do in this hypothetical.

7 Q I believe you also testified that RAM's system is  
8 set up -- is engineered on a zoned basis. Do you recall that  
9 testimony?

10 A I think I, I think I said that the Commonwealth  
11 terminal supports zoning and that if we wanted a customer in  
12 Lexington to get a page and not a customer in Charleston to  
13 get a page, that that's easily done through the terminal.

14 Q Well, I, I, I think I am confused now. I recall  
15 your testimony that the Commonwealth terminal supported the  
16 zone --

17 A Yes.

18 Q -- approach to a paging system.

19 A Yes.

20 Q But I thought I understood you to say that the --  
21 that, that RAM's system was also set up on a zoned basis. Did  
22 I misunderstand you?

23 A RAM's system is set up on a zone -- we sell it by  
24 zones via TNPP links. We don't use zoning in the  
25 Commonwealth, zoning per se, some transmitters going -- some

1 others to go off as a zoning solution although that's in there  
2 and it, it could work very, very, very well.

3 Q Why? Is, is, is zoning not necessary in your case?

4 A We have designed it as a TNPP zoning network so that  
5 we don't zone intertransmitter zoning. We have nodes that  
6 control different -- because of the problems with linking and  
7 sharing frequencies across broad geographic areas, we have  
8 nodes set up that allow the local node to do the local busy  
9 monitoring to ensure channel compliance and we don't use  
10 zoning in the Commonwealth as one transmitter going off and  
11 another going off within the same node. Lexington in our  
12 example is a different node.

13 Q All right. You used some terms there that may not  
14 be familiar ones to everyone in, in the room and I will try  
15 not to extend this unduly, but I think we need to understand a  
16 little more clearly exactly the type of engineering  
17 arrangement that you're talking about here. Now, you say it  
18 is zoned on a TNPP, is that?

19 A Data link, yes.

20 Q Would, would you tell us what TNPP stands for?

21 A Telecator Network Paging Protocol.

22 Q Okay, and the -- this does what in, in brief terms?

23 A Transmits data between terminals.

24 Q Between terminals, okay.

25 A Between transmitter controllers I should say,

1 actually.

2 Q Is that something different than a terminal?

3 A Well, the terminal has two functions. Again, the  
4 telephony side of the terminal, the transmitter controller  
5 side of the terminal and the database side and administration.  
6 Transmitter controllers don't necessarily have the database or  
7 the telephony side in them. It's mainly a device that sits  
8 there and controls transmitters local to it.

9 Q Okay. Now, how many, how many controllers are  
10 connected via this TNPP arrangement to RAM's Ashland terminal?

11 A Today?

12 Q Yes.

13 A I believe 10.

14 Q Okay, and these are in the Ohio, West Virginia --

15 A Kentucky, Ohio, West Virginia, Indiana region.

16 Q Indiana region, okay. And these are -- the, the  
17 controllers are in different markets where you have facilities  
18 throughout that region?

19 A Yes.

20 Q And is -- did you say Lexington was one of the  
21 nodes?

22 A Yes.

23 Q Okay. A call that -- and so you, you provide  
24 service -- paging service to, to customers in the Lexington  
25 area, do you not?

1           A     Yes, we do.

2           Q     All right. Let's, let's say that you have a  
3 Lexington customer that wants to place a page and for the sake  
4 of this example let's say that the -- well, I guess I have to  
5 back up a little bit. When that customer wants service, what  
6 geographic levels of service do you offer -- does RAM offer  
7 that customer?

8           A     What do you mean?

9           Q     Well --

10          A     What cities do we cover?

11          Q     Well, if I'm in Lexington and I want to get paging  
12 service from RAM, can I get Lexington only?

13          A     Yes.

14          Q     Is that the, the, the most basic form of service?

15          A     Yes.

16          Q     All right. Now, step me up through the different  
17 levels of service that -- I'm talking about geographic  
18 coverage.

19          A     Yeah. Lexington; Lexington, Louisville, Cincinnati;  
20 Lexington, Columbus, Marietta; Lexington, Ashland,  
21 Prestonsburg, Paintsville, Pikeville, Charleston, Beckley.

22          Q     Okay. I, I don't, I don't mean to test your memory  
23 on the permutations and combinations. How does it work? Does  
24 it -- does the -- does RAM offer a menu of cities --

25          A     Yes.

1 Q -- and the customer can take one from column A and  
2 two from column B or --

3 A Not necessarily. They have what we call zones that  
4 we've already pre-established these cities are Zone 1, these  
5 cities are Zone 2, and then within the combination of zones,  
6 yes, they pick and choose what they need.

7 Q Okay. Well, I don't want to get too detailed. I'm  
8 just trying to understand how this works out. So, local only  
9 is a class below the one-zone service. Is that right?

10 A Not necessarily. A zone is the minimum.

11 Q Okay. One zone, it could be one city or could be  
12 more than one city, but it's a --

13 A It's usually more than one city.

14 Q Okay. The, the first level of service is Zone 1 and  
15 then there can be any number of zones that they can have that  
16 they, they can subscribe to, is that right, up to 10?

17 A Well, no. They can pick any number of zones that we  
18 have available, yes.

19 Q It's a building block?

20 A But the, the 10 nodes, there may be two nodes in a  
21 zone. It's, it's not like that.

22 Q Well, I haven't got to that. I'm trying to, I'm  
23 trying to, to go from the stand point of a customer who wants  
24 service and I go to RAM and try to figure out what levels of  
25 service I'm being offered. The most basic is one the zone.

1 Now, do I understand that I can pick any combination of, of  
2 different zones that RAM offers or are there packages that  
3 they must take Zone 1, 3 and 5 --

4 A There are packages pre-established of which zones  
5 you, you, you pick, but -- yes, there are packages.

6 Q What, four or five different packages that they  
7 can --

8 A Yes.

9 Q And it would offer just different areas, some  
10 broader than others, but others different parts of the --  
11 different parts of your service area. Is that --

12 A Yes.

13 Q -- that's the way it works?

14 A Yes.

15 Q All right. Now, typically, what city would be  
16 associated with Lexington, the one-zone coverage?

17 A Let's see, probably Lexington, London, Somerset,  
18 Cincinnati.

19 Q Ashland would -- I'm sorry, Ashland would be in a  
20 different zone?

21 A Yes.

22 Q Okay. Now, let's, let's assume that I get a one-  
23 zone package -- subscribers and I'm in -- the, the person who  
24 places a page is in Lexington trying to reach me in Lexington.  
25 Typically, what happens to that call through RAM's system to



1 get to my pager?

2 A Where is the caller at?

3 Q Caller is in Lexington.

4 A And the pager is in Lexington?

5 Q Yes.

6 A And the subscriber has, has subscribed to Lexington  
7 service?

8 Q Zone 1 service.

9 A Okay. The, the caller would call a number local to  
10 Lexington which would be transported back to the Ashland  
11 terminal. The Ashland terminal would then based on the DID  
12 number look up the subscriber, zone or what we call the  
13 transmitter code, take the transmitter code, send out TNPP  
14 packets to the appropriate transmitters' nodes that would go  
15 off. The nodes would then wait for channel time and broadcast  
16 the page.

17 Q And, and the nodes are like any terminals there but  
18 not with all the --

19 A That's right. That's right.

20 Q And I assume that same process would be repeated if  
21 say the customer had selected a combination of three different  
22 zones in some fashion either as part of the package or however  
23 else it's offered. The same process would be repeated not  
24 only to the controller in the Lexington zone but to any and  
25 all controllers in the other zones as well. Is that right?